

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH GARZA,

Plaintiff,

vs.

LVNV FUNDING, LLC,

Defendant.

) FILED: JUNE 3, 2008
) 08CV3197 PH
) JUDGE PALLMEYER
) MAGISTRATE JUDGE ASHMAN
)
)
)
)
)

COMPLAINT

INTRODUCTION

1. Plaintiff Joseph Garza brings this action to secure redress from unlawful credit and collection practices engaged in by defendant LVNV Funding, LLC. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 et seq. ("FDCPA"), and state law.

2. The FDCPA broadly prohibits unfair or unconscionable collection methods; conduct which harasses, oppresses or abuses any debtor; and any false, deceptive or misleading statements, in connection with the collection of a debt; it also requires debt collectors to give debtors certain information. 15 U.S.C. §§1692d, 1692e, 1692f and 1692g.

VENUE AND JURISDICTION

3. This Court has jurisdiction under 15 U.S.C. §1692k (FDCPA) and 28 U.S.C. §§1331, 1337 and 1367.

4. Venue and personal jurisdiction in this District are proper because:

a. Defendant's collection communications were received by plaintiff within this District;

b. Defendant does or transacts business within this District.

PARTIES

5. Plaintiff Joseph Garza is an individual who resides in the Northern District

of Illinois.

6. Defendant LVNV Funding, LLC ("LVNV") is a limited liability company organized under Delaware law that does business in Illinois. Its registered agent and office are CT Corporation System, 208 S. LaSalle St., Suite 814, Chicago, IL 60604.

7. Defendant LVNV is engaged in the business of purchasing charged-off debts and attempting to collect them.

8. Defendant LVNV stated on its Web site, www.lvnvfunding.com, that "LVNV Funding purchases portfolios of both domestic (U.S.) and international consumer debt from credit grantors including banks, finance companies, and other debt buyers. As the new owner of any debt purchased from the original creditor or from another debt buyer, LVNV Funding's name may appear on a customer's credit bureau, or in a letter from a collection agency if the account is delinquent."

9. Defendant LVNV pays an average of less than 10 cents on the dollar for the charged-off debts it purchases.

10. LVNV has been the plaintiff in more than 1,000 collection lawsuits filed in Illinois courts.

11. Defendant LVNV uses the telephone and mails in the conduct of its business.

12. Defendant LVNV is a debt collector as defined in the FDCPA.

13. Defendant LVNV is part of the Sherman Financial Group. Other entities in the group are named (a) Sherman Acquisition, (b) Ventus Capital Services and (c) Resurgent Capital Services.

FACTS

14. LVNV Funding, LLC has been attempting to collect from plaintiff an alleged Montgomery Ward credit card debt with an account number ending in 2442. The alleged debt was incurred primarily for personal, family or household purposes and not for business purposes.

15. Plaintiff settled and paid this debt in 2002, as shown by Exhibit A.

16. Notwithstanding this fact, plaintiff has been subjected to continual collection attempts and harassment by entities in the Sherman Financial Group, including LVNV Funding, LLC.

17. As a result, plaintiff was forced to retain counsel.

18. By letter of October 6, 2006, counsel informed Ventus Capital Services, agent for LVNV Funding, LLC, that the purported debt was disputed and of counsel's representation of Mr. Garza. A copy of the letter and certified mail receipt are attached as Exhibit B. Ventus Capital Services was an affiliate or joint venture within the Sherman Financial Group.

19. At no time has LVNV Funding, LLC or any of its agents verified the debt.

20. On November 18, 2006, another collection agency employed by LVNV Funding, LLC with respect to the same debt, sent a letter to Mr. Garza care of his counsel demanding payment of the debt. A copy of this letter is attached as Exhibit C. It was sent on behalf of LVNV Funding, LLC.

21. Other, similar letters were sent on December 20, 2006 (Exhibit D) and January 17, 2007 (Exhibit E). They were also sent on behalf of LVNV Funding, LLC.

22. By letter of February 20, 2007, counsel again informed LVNV's agent that the debt was disputed (Exhibit F).

23. This letter was acknowledged on February 21, 2007 (Exhibit G).

24. LVNV Funding, LLC, instead of verifying the debt or ceasing collection activity, intentionally and maliciously sought to harass Mr. Garza by hiring other collection agencies to place calls and send letters to him.

25. On or about June 28, 2007, Northland Group, Inc., on behalf of LVNV Funding, LLC, sent plaintiff, directly, the letter attached as Exhibit H.

26. On or about August 12, 2007, Northland Group, Inc., on behalf of LVNV Funding, LLC, sent plaintiff, directly, the letter attached as Exhibit I.

27. On or about October 11, 2007, Northland Group, Inc., on behalf of LVNV

Funding, LLC, sent plaintiff, directly, the letter attached as Exhibit J.

28. On or about February 29, 2008, Financial Recovery Services, Inc., on behalf of LVNV Funding, LLC, sent plaintiff, directly, the letter attached as Exhibit K.

29. On or about April 15, 2008, Financial Recovery Services, Inc., on behalf of LVNV Funding, LLC, sent plaintiff, directly, the letter attached as Exhibit L.

30. All of these letters relate to the debt plaintiff settled and paid in 2002.

31. Plaintiff was harassed and injured by these continual collection efforts.

32. LVNV Funding, LLC has previously been sued for engaging in the same practice at issue here, namely, when a debt is disputed, sending it to one or more other collection agencies for the purpose of harassing the debtor. *E.g., Martin v. LVNV Funding*, 07 C 4414 (N.D. Ill.).

COUNT I – FDCPA

33. Plaintiff incorporates paragraphs 1-32.

34. By causing the sending of Exhibits H-L, and any other collection contacts that occurred on its behalf during a period beginning one year prior to the filing of this action, defendant LVNV Funding, LLC violated 15 U.S.C. §1692c.

35. Section 1692c provides:

**§ 1692c. Communication in connection with debt collection
[Section 805 of P.L.]**

(a) Communication with the consumer generally--Without the prior consent of the consumer given directly to the debt collector or the express permission of a court of competent jurisdiction, a debt collector may not communicate with a consumer in connection with the collection of any debt--

. .

(2) if the debt collector knows the consumer is represented by an attorney with respect to such debt and has knowledge of, or can readily ascertain, such attorney's name and address, unless the attorney fails to respond within a reasonable period of time to a communication from the debt collector or unless the attorney consents to direct communication with the consumer; . . .

36. In addition, Exhibits H-L falsely represent that Mr. Garza owes money, when

in fact the debt had been settled and paid in 2002, and thereby violate 15 U.S.C. §§1692e, 1692e(2), and 1692e(10).

37. Section 1692e provides:

§ 1692e. False or misleading representations [Section 807 of P.L.]

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section: . . .

(2) The false representation of--

(A) the character, amount, or legal status of any debt; . . .

(10) The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.

WHEREFORE, the Court should enter judgment in favor of plaintiff and against defendant for:

- (1) Statutory damages;
- (2) Actual damages;
- (3) Attorney's fees, litigation expenses and costs of suit;
- (4) Such other and further relief as the Court deems proper.

COUNT II – ILLINOIS COLLECTION AGENCY ACT

38. Plaintiff incorporates paragraphs 1-32.

39. Defendant LVNV Funding, LLC is a "collection agency" as defined in the Illinois Collection Agency Act, 225 ILCS 425/1 et seq.

40. Section 425/3(d), as amended effective January 1, 2008, brings debt buyers within its purview by providing that "[a] person, association, partnership, corporation, or other legal entity acts as a collection agency when he or it ... [b]uys accounts, bills or other indebtedness and engages in collecting the same." Previously coverage was limited to a person who "[b]uys accounts, bills or other indebtedness with recourse and engages in collecting the same." By deleting "with

recourse,” the legislature intended to classify as a “collection agency” persons such as the defendant who buy charged-off debts for their own account.

41. Defendant LVNV Funding, LLC violated the following provisions of 225 ILCS 425/9.2:

225 ILCS 425/9.2. (Effective January 1, 2008) Communication in connection with debt collection

Sec. 9.2. (a) Without the prior consent of the debtor given directly to the debt collector or collection agency or the express permission of a court of competent jurisdiction, a debt collector or collection agency may not communicate with a debtor in connection with the collection of any debt in any of the following circumstances: . . .

(2) If the debt collector or collection agency knows the debtor is represented by an attorney with respect to such debt and has knowledge of or can readily ascertain, the attorney's name and address, unless the attorney fails to respond within a reasonable period of time to a communication from the debt collector or collection agency or unless the attorney consents to direct communication with the debtor. . . .

42. Defendant violated the following provisions of 225 ILCS 425/9:

. . . (20) Attempting or threatening to enforce a right or remedy with knowledge or reason to know that the right or remedy does not exist. . . .

43. All communications on behalf of LVNV Funding, LLC subsequent to December 31, 2007 are violations.

44. A private right of action exists for violation of the ICAA. *Sherman v. Field Clinic*, 74 Ill. App. 3d 21, 392 N.E.2d 154 (1st Dist. 1979).

WHEREFORE, plaintiff requests that the Court grant the following relief in favor of plaintiff and against defendant:

- a. Compensatory and punitive damages;
- b. Costs;
- c. Such other and further relief as is appropriate.

COUNT III – DECLARATORY AND INJUNCTIVE RELIEF

45. Plaintiff incorporates paragraphs 1-32.

46. Plaintiff is entitled to a declaration that he does not owe the debt in question and an injunction against further collection attempts.

WHEREFORE, plaintiff requests that the Court grant the following relief in favor of plaintiff and against defendant:

- a. A declaration that plaintiff owes nothing on the Montgomery Ward account ending in 2442;
- b. An injunction against further efforts to collect it, in any manner;
- c. Costs;
- d. Such other and further relief as is appropriate.




Daniel A. Edelman

Daniel A. Edelman
Cathleen M. Combs
James O. Lattuner
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
120 S. LaSalle Street, Suite 1800
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

JURY DEMAND


Plaintiff demands trial by jury.



Daniel A. Edelman

NOTICE OF LIEN

Please be advised that we claim a lien upon any recovery herein for 1/3 or such amount as a court awards.



Daniel A. Edelman

Daniel A. Edelman
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
120 S. LaSalle Street, Suite 1800
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)

08CV3197 PH
JUDGE PALLMEYER
MAGISTRATE JUDGE ASHMAN

EXHIBIT A



May 30, 2002

Roberta Bonar
Sherman Acquisitions
P.O. Box 741148
Hosuton, TX 77274

RE: Joseph and Virginia Garza a/c # [REDACTED] 2442
[REDACTED]

Dear Ms. Bonar,

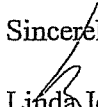
Enclosed please find check # 475-7741205 in the amount of \$2,000.00 as settlement in full for the above case file as per discussion with Mr. & Mrs. Garza.

Please forward the satisfaction for this collection item to us at:

First East Side Savings Bank
Linda Jordan
11157 S. Ewing Avenue
Chicago, IL 60617

Thank-you for your cooperation.

Sincerely,



Linda Jordan
Loan Servicing
(773) 731-1200 x-11

Cc:file

11157 EWING AVENUE, CHICAGO, IL 60617 * PHONE: 773 - 731 - 1200 * FAX: 773 - 731 - 1204
19031 OLD LaGRANGE RD, MOKENA, IL 60448 * PHONE: 708-479-3700 * FAX: 708-479-3777

Visit Us @ www.firsteastsidesavings.com

Check Cleared on
June 10, 2002

 1st EAST SIDE SAVINGS BANK 11157 S. EWING AVENUE CHICAGO, ILLINOIS 60617	475 7741205
PAY TO THE ORDER OF SHERMAN ACQUISITIONS \$ 2,000.00	
1st EAST SIDE SAVINGS \$2,000.00 & 00/100 DOLLARS	
RE: GARZA A/C# [REDACTED] 2442 LOANS-IN-PROCESS ACCOUNT	NON-NEGOTIABLE [Signature] PRESIDENT & CHAIRMAN
PAYABLE THRU FIRSTSTAR BANK BLOOMINGTON, MN	22300711

FIRST EAST SIDE SAVINGS BANK
 LOANS-IN-PROCESS ACCOUNT

COPY
 DETACH AND RETURN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
 IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

475 7741205

DATE	DESCRIPTION	AMOUNT
05/30/02	02970052-5 SETTLEMENT IN FULL FOR A/C# [REDACTED] 2442 RE: JOSEPH AND VIRGINIA GARZA [REDACTED]	\$2,000.00

EXHIBIT B

EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: edcombs@aol.com

www.edcombs.com

October 6, 2006

CERTIFIED MAIL

Ventus Capital Services, LP
9700 Bissonnett, Suite 2000
Houston, TX 77036

Re: Joseph Garza 2790728

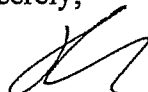
Ladies/ Gentlemen:

Please be advised that we represent the above individual and that our client disputes the claimed debt(s) described above. Please provide any contract or agreement signed by our client and an account history showing how you arrived at the conclusion that our client owes the amounts claimed and when this alleged debt(s) was charged off.

Furthermore, you are hereby requested, as required by the Uniform Commercial Code, to provide proof that you or your principal is in fact the assignee of the debt(s) described above and that you are legally authorized to attempt to collect the claimed debt(s) from our client. Unless and until such proof is furnished, we do not recognize any right on your part to attempt to collect any amount from our client through any means, including credit reporting.

Thank you.

Sincerely,


Daniel A. Edelman

cc: client

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage	\$.39	Postmark Here
Certified Fee	2.40	
Return Receipt Fee (Endorsement Required)	1.85	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 4.64	

Sent To Ventus Capital Svcs LP
 Street, Apt. No.,
 or PO Box No. 9700 Bissonnet Ste 2000
 City, State, ZIP+4 Houston, TX 77036

PS Form 3800, June 2002 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>X</p>	
<p>1. Article Addressed to:</p> <p><u>Ventus Capital Svcs LP</u> <u>9700 Bissonnet</u> <u>Ste 2000</u> <u>Houston, TX 77036</u></p>		<p>B. Received by (Printed Name) C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p><u>7002 3150 0003 3626 6950</u></p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

EXHIBIT C

726 Exchange Street, Suite 700
Buffalo, New York 14210

ADDRESS SERVICE REQUESTED



CAPITAL MANAGEMENT SERVICES, LP
726 Exchange Street - Suite 700, Buffalo, NY 14210
Office Hours: M-Th 8 a.m. - 11 p.m. ET
Fri 8 a.m. - 10 p.m., Sat 8 a.m. - 4 p.m. ET
Sun 9 a.m. - 1 p.m. ET
Toll Free: 1-800-767-7419, Fax: (716) 852-1620



#BWNJTHB *****MIXED AADC 140 T7 P1
#0253479018#



Joseph Garza
C/O Daniel Edelman E
120 S. Lasalle St, 18th F
Chicago, IL 60603

Previous Creditor: Montgomery Ward - MONTGOMERY WARD
Current Creditor: LVNV Funding LLC
Account #: [REDACTED] 2442
Balance: \$1685.69
AMOUNT ENCLOSED: _____

PLEASE DETACH AND RETURN TOP PORTION WITH PAYMENT

Dear Joseph Garza:

November 18, 2006

This company has been engaged by Resurgent Capital Services, LP, the servicer of the account, to resolve your delinquent debt of \$1685.69. Please submit your payment and make your check or money order payable to Capital Management Services, LP. to the above address.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice this office will provide you with the name and address of the original creditor, if different than the current creditor.

Our representatives are trained to offer assistance regarding this obligation. For payment arrangements or account inquiries, you may contact Capital Management Services, LP. at 726 Exchange Street, Suite 700, Buffalo, NY 14210 or call 1-800-767-7419 Mon. through Thurs. 8 am to 11 pm ET, Fri. 8 am to 10 pm ET, Sat. 8 am to 4 pm ET or Sun. 9 am to 1 pm ET. You may also make payments online at: www.cms-collect.com.

Please see important privacy information included with this notice.

This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

PRIVACY NOTICE

This Privacy Notice is being given on behalf of each of the following related companies (the "Sherman Companies"). It describes the general policy of the Sherman Companies regarding the personal information of customers and former customers.

Sherman Acquisition, LP Sherman Acquisition, LLC Ascent Card Services, LLC

Resurgent Capital Services, LP FNBM, LLC LVNV Funding, LLC

Ascent Card Services II, LLC

Information We May Collect. The Sherman Companies may collect the following personal information: (1) information that we receive from your account file at the time we purchase or begin to service your account, such as your name, address, social security number, and assets; (2) information that you may give us through discussion with you, or that we may obtain through your transactions with us, such as your income and payment history; (3) information that we receive from consumer reporting agencies, such as your creditworthiness and credit history, and (4) information that we obtain from other third party information providers, such as public records and databases that contain publicly available data about you, such as bankruptcy and mortgage filings. All of the personal information that we collect is referred to in this notice as "collected information".

Confidentiality and Security of Collected Information. At the Sherman Companies, we restrict access to collected information about you to individuals who need to know such collected information in order to perform services in connection with your account. We maintain physical safeguards (like restricted access), electronic safeguards (like encryption and password protection), and procedural safeguards (such as authentication procedures) to protect collected information about you.

Sharing Collected Information with Affiliates and Third Parties

Sharing with Affiliates. From time to time, the Sherman Companies may share collected information about customers and former customers with each other and with their affiliated financial services companies in connection with administering and collecting accounts.

Sharing with Third Parties. The Sherman Companies do not share collected information about customers or former customers with third parties, except as permitted by applicable privacy law. For example, collected information may be shared in certain circumstances (A) with third parties, to service or enforce accounts, (B) with credit reporting agencies, and (C) with law enforcement officials, to protect against fraud or other crimes.

Special Notice Regarding Collected Information Subject to the Fair Debt Collection Practices Act.

This Privacy Notice is being sent to you by the Sherman Companies in accordance with federal privacy law, and it describes our privacy practices generally. However, please be assured that collected information that is received or used for purposes of collecting a debt subject to the Fair Debt Collection Practices Act is communicated only in accordance with that Act.

EXHIBIT D



ADDRESS SERVICE REQUESTED



#BWNJTHB *****MIXED AADC 140 T5 P1
#0253479018#



Joseph Garza
C/O Daniel Edelman E
120 S. Lasalle St, 18th F
Chicago, IL 60603

CAPITAL MANAGEMENT SERVICES, LP
726 Exchange Street - Suite 700, Buffalo, NY 14210
Office Hours: M-Th 8 a.m. - 11 p.m. ET
Fri 8 a.m. - 10 p.m., Sat 8 a.m. - 4 p.m. ET
Sun 9 a.m. - 1 p.m. ET
Toll Free: 1-800-767-7419, Fax: (716) 852-1620

Previous Creditor: Montgomery Ward - MONTGOMERY WARD
Current Creditor: LVNV Funding LLC
Account #: [REDACTED] 2442
Balance: \$1699.53

Dear Joseph Garza:

December 20, 2006

Our records indicate that we have not received a payment on behalf of Resurgent Capital Services, LP, the servicer of the account, since our first notice. We wish to inform you that we are willing to negotiate a repayment arrangement with you. We are authorized to accept payment on this account provided it is received in a timely manner.

Our representatives are trained to offer assistance regarding this obligation. For payment arrangements or account inquiries, please call Capital Management Services, LP. at 1-800-767-7419.

This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

EXHIBIT E

726 Exchange Street, Suite 700
Buffalo, New York 14210

ADDRESS SERVICE REQUESTED



CAPITAL MANAGEMENT SERVICES, LP
726 Exchange Street - Suite 700, Buffalo, NY 14210
Office Hours: M-Th 8 a.m. - 11 p.m. ET
Fri 8 a.m. - 10 p.m., Sat 8 a.m. - 4 p.m. ET
Sun 9 a.m. - 1 p.m. ET
Toll Free: 1-800-767-7419, Fax: (716) 852-1620



#BWNJTHB *****MIXED AADC 140 T5 P1
#0253479018#



Joseph Garza
C/O Daniel Edelman E
120 S. Lasalle St, 18th F
Chicago, IL 60603

Previous Creditor: Montgomery Ward - MONTGOMERY WARD
Current Creditor: LVNV Funding LLC
Account #: [REDACTED] 2442
Balance: \$1699.53
AMOUNT ENCLOSED: _____
Current Address: _____
Current Phone #: _____

PLEASE DETACH AND RETURN TOP PORTION WITH PAYMENT

January 17, 2007

*****SETTLEMENT OFFER*****

Dear Joseph Garza:

In an effort to liquidate as many files as possible, and realizing that it is income tax refund time, we are making the following settlement offers:

- A. 65% reduction of your present balance to the amount of \$594.84, if paid in full by 01/31/2007
(A savings of: \$1,104.70)
- B. 60% reduction of your present balance to the amount of \$679.81, if paid in full by 02/28/2007
(A savings of: \$1,019.72)
- C. 55% reduction of your present balance to the amount of \$764.79, if paid in full by 03/31/2007
(A savings of: \$934.74)

The amount of money you want to save is in your control. If you are expecting an income tax refund, or profit sharing check, but don't have the check yet, we may be able to except a post-dated check by phone as a form of payment. In addition we will provide an account paid letter and close this account.

You may send the settlement payment to Capital Management Services, LP. at 726 Exchange Street, Suite 700, Buffalo, NY 14210. Our representatives are trained to offer assistance regarding this obligation. For account inquiries, you may contact Capital Management Services, LP. by calling 1-800-767-7419 Mon. through Thurs. 8 am to 11 pm ET, Fri. 8 am to 10 pm ET Sat. 8 am to 4 pm ET or Sun. 9 am to 1 pm ET. You may also make payments online at: www.cms-collect.com.

Should you wish to discuss the manner in which your account has been handled, please call Capital Management Services, LP. Compliance Department at 1-800-519-2687.

This is an attempt to collect a debt; any information obtained will be used for that purpose. This communication is from a debt collector.

EXHIBIT F

EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.
120 S. LaSalle Street, 18th floor
Chicago, Illinois 60603-3403
(312) 739-4200
(800) 644-4673
(312) 419-0379 (FAX)
Email: edcombs@aol.com
www.edcombs.com

February 20, 2007

VIA FACSIMILE: (716) 852-1620

Capital Management Services, LP
726 Exchange Street, Suite 700
Buffalo, NY 14210

Re: Joseph Garza # [REDACTED] 2442

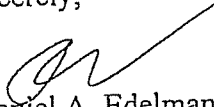
Ladies/ Gentlemen:

Please be advised that we represent the above individual and that our client disputes the claimed debt(s) described above. Please provide any contract or agreement signed by our client and an account history showing how you arrived at the conclusion that our client owes the amounts claimed and when this alleged debt(s) was charged off.

Furthermore, you are hereby requested, as required by the Uniform Commercial Code, to provide proof that you or your principal is in fact the assignee of the debt(s) described above and that you are legally authorized to attempt to collect the claimed debt(s) from our client. Unless and until such proof is furnished, we do not recognize any right on your part to attempt to collect any amount from our client through any means, including credit reporting, and you are advised that our client refuses to pay and requests cessation of further communications.

Thank you.

Sincerely,


Daniel A. Edelman

MODE = MEMORY TRANSMISSION

START=FEB-20 08:48

END=FEB-20 08:49

FILE NO.=325

STN NO.	COMM.	ONE-TOUCH/ ABBR NO.	STATION NAME/TEL NO.	PAGES	DURATION
001	OK	*	18143#17168521620#	001/001	00:00:26

-ECLG LLC

***** -ECLG LLC

- ***** -

3124190379- *****

EDELMAN, COMBS, LATTURNER & GOODWIN, L.L.C.

120 S. LaSalle Street, 18th floor

Chicago, Illinois 60603-3403

(312) 739-4200

(800) 644-4673

(312) 419-0379 (FAX)

Email: edcombs@aol.com

www.edcombs.com

February 20, 2007

VIA FACSIMILE: (716) 852-1620

Capital Management Services, LP
726 Exchange Street, Suite 700
Buffalo, NY 14210

Re: Joseph Garza # [REDACTED] 2442

Ladies/ Gentlemen:

Please be advised that we represent the above individual and that our client disputes the claimed debt(s) described above. Please provide any contract or agreement signed by our client and an account history showing how you arrived at the conclusion that our client owes the amounts claimed and when this alleged debt(s) was charged off.

Furthermore, you are hereby requested, as required by the Uniform Commercial Code, to provide proof that you or your principal is in fact the assignee of the debt(s) described above and that you are legally authorized to attempt to collect the claimed debt(s) from our client. Unless and until such proof is furnished, we do not recognize any right on your part to attempt to collect any amount from our client through any means, including credit reporting, and you are advised that our client refuses to pay and requests cessation of further communications.

Thank you.

Sincerely,

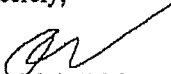

Daniel A. Edelman

EXHIBIT G

726 Exchange Street, Suite 700
Buffalo, NY 14210
Tel: (716) 871-9050
Fax: (716) 852-1620

Capital Management Services, LP

February 21, 2007

Daniel Edelman
120 S. LaSalle St. 18th floor
Chicago, IL 60603-3403

Re: Joseph Garza- [REDACTED] 2442

Dear Mr. Edelman:

Capital Management Services, LP. is in receipt of your recent correspondence requesting verification of your account being handled by our office. Our office has requested this information from our client, Resurgent Capital Services LP. Once we have received the information from Resurgent Capital Services LP, it will be forwarded to you.

Our representatives are trained to offer assistance regarding this obligation. For account inquiries, please call Capital Management Services, LP. toll free at (800) 457-8220. Should you wish to discuss the manner in which your account has been handled, please call our Compliance Office toll free at (800) 519-2687.

This communication is from a debt collector.

Important information may be found on the back of this letter. We are required under state law to notify consumers of the following rights. This list does not contain a complete list of the rights consumers have under state and federal law.

Sincerely,

Capital Management Services, LP.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

ADDITIONAL INFORMATION FOR COLORADO RESIDENTS

FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.AGO.STATE.CO.US/CADC/CADCMAN.CFM.

ADDITIONAL INFORMATION FOR MASSACHUSETTS RESIDENTS

NOTICE OF IMPORTANT RIGHTS

YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE THIS REQUEST BY WRITING TO THE DEBT COLLECTOR.

ADDITIONAL INFORMATION FOR MINNESOTA RESIDENTS

This collection agency is licensed by the Minnesota Department of Commerce.

ADDITIONAL INFORMATION FOR NEW YORK CITY RESIDENTS

This collection agency is licensed by the New York City Department of Consumer Affairs, License No. 1242722.

ADDITIONAL INFORMATION FOR NORTH CAROLINA RESIDENTS

This collection agency conducts business in the state of North Carolina under North Carolina Department of Insurance Permit No. 4416.

ADDITIONAL INFORMATION FOR TENNESSEE RESIDENTS

This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance.

ADDITIONAL INFORMATION FOR WISCONSIN RESIDENTS

This collection agency is licensed by the Division of Banking, P.O. Box 7876, Madison, Wisconsin 53707

EXHIBIT H



Northland Group Inc.

Toll Free: 866-380-8783
NGI@northlandgroup.com
Hours of Operation: M-Th 7-9, F 7-7, Sat 7-4, Sun 3-7 CT

June 28, 2007



Joseph Garza (06/28x32)
10540 S Green Bay Ave
Chicago, IL 60617-6237



P.O. Box 390846
Edina, MN 55439
Mail Code SP19

Northland Account #: [REDACTED]
Balance Due: \$1,800.33
Settlement Offer: \$630.12
Current Creditor: LVNV Funding LLC
Previous Creditor: Montgomery Ward
Original Account #: [REDACTED] 2442

YOU MAY PAY ONLINE AT www.payments2northland.com

Dear Joseph Garza,

M32-32 P181/0628 2

The current creditor, LVNV Funding LLC, will allow you to settle your account for \$630.12 in 2 payments starting on 07/19/07. The payments can be no more than 30 days apart. Once the two payments have been paid to our office on time, we will consider this account satisfied and closed, and a release letter will be sent. Please send in the payments along with a payment stub to the address below.

As of the date of this letter, the current balance on your account is \$1,800.33. Because of interest that may vary from day to day, the balance due on the day you pay may be greater. This does not affect the above settlement offer.

Sincerely,

Northland Group, Inc.
866-380-8783

If you would like to pay your bill without talking to a representative, please log onto www.payments2northland.com.
Your access code is **1.15492440.508** You can also communicate with the Northland Group, Inc. through the payment website.

If you wish to talk to a representative please call Northland Group, Inc. at this toll-free number 866-380-8783.

This is an attempt to collect a debt and any information obtained will be used for that purpose.
This communication is sent to you by Northland Group, Inc., a debt collector and a member of ACA International.
This collection agency is licensed by the Minnesota Department of Commerce.

1 of 2

Northland Account #: [REDACTED]
Client #: SP19
Original Account #: [REDACTED] 2442
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Or pay online at:
payments2northland.com

Payment Amount: \$315.06
Due Date: 07/19/07

Detach coupon and mail with payment

2 of 2

Northland Account #: [REDACTED]
Client #: SP19
Original Account #: [REDACTED] 2442
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Or pay online at:
payments2northland.com

Payment Amount: \$315.06
Due Date: 30 days from 1st payment

Detach coupon and mail with payment

EXHIBIT I



Northland Group Inc.

PAYMENT ADDRESS P.O. Box 390846
Edina, MN 55439
NGI@northlandgroup.com
Hours M-Th 7-9, F 7-7, Sat 7-4, Sun 3-7 CT



Joseph Garza ([REDACTED]-08/12x283)
10540 S Green Bay Ave
Chicago, IL 60617-6237



CURRENT CREDITOR

LVNV Funding LLC

ORIGINAL ACCOUNT #

[REDACTED] 2442

PHONE NUMBER

866-380-8783

Account number: [REDACTED]

CURRENT BALANCE

\$1,815.84

SETTLEMENT DUE

\$635.54

DUE DATE

See Coupons Below

STATEMENT DATE

August 12, 2007

The current creditor, LVNV Funding LLC, has authorized a settlement on the above referenced account. Your account will be considered settled if you pay the settlement of \$635.54. Please make payments by due dates below. Upon receipt and clearance of \$635.54, a release letter will be issued confirming the account is satisfied and closed.

As of the date of this letter, the current balance on your account is \$1,815.84. Because of interest that may vary from day to day, the balance due on the day you pay may be greater. This does not affect the above settlement offer.

PAY YOUR ACCOUNT BY ONE OF THE FOLLOWING:

- * **Pay online:** Log onto <https://www.payments2northland.com>. Your access code will be **1.15492440.508**
- * **Pay by mail:** Send payments to PO Box 390846, Edina, MN 55439.
- * **Pay by phone:** Please call Northland Group, Inc. toll-free at **866-380-8783**. We offer check by phone, Western Union and Money Gram.

This communication is sent to you by Northland Group, Inc., a debt collector and a member of ACA International. This collection agency is licensed by the Minnesota Department of Commerce. This is an attempt to collect a debt and any information obtained will be used for that purpose.

PAYMENT COUPON
PLEASE INCLUDE WITH PAYMENT

1 of 3

Northland Account #: [REDACTED]
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Payment Amount: \$211.85

Due Date: 09/02/07

PAYMENT COUPON
PLEASE INCLUDE WITH PAYMENT

2 of 3

Northland Account #: [REDACTED]
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Payment Amount: \$211.85

Due Date: 30 days from 1st payment

PAYMENT COUPON
PLEASE INCLUDE WITH PAYMENT

3 of 3

Northland Account #: [REDACTED]
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Payment Amount: \$211.84

Due Date: 30 days from 2nd payment

EXHIBIT J



Northland Group Inc.

P.O. Box 390846
Edina, MN 55439
Mail Code SP19

Toll Free: 866-380-8783
NGL@northlandgroup.com
Hours of Operation: M-Th 7-9, F 7-7, Sat 7-4, Sun 3-7 CT

October 11, 2007



Joseph Garza-10/11x33
10540 S Green Bay Ave
Chicago, IL 60617-6237



Northland Account #: [REDACTED]
Current Balance Due: \$1,850.73
Settlement Offer: \$647.76
Current Creditor: LVNV Funding LLC
Previous Creditor: Montgomery Ward/Montgomery Ward
Original Account #: [REDACTED] 2442

YOU MAY PAY ONLINE AT www.payments2northland.com

Dear Joseph Garza,

M33-33 P329/1011_2

The current creditor, LVNV Funding LLC, will allow you to settle your account for \$647.76 in 3 payments starting on 11/01/07. The payments can be no more than 30 days apart. Once all three payments have been paid to our office on time, we will consider this account satisfied and closed, and a release letter will be sent. Please send in the payments along with a payment stub to the address below.

As of the date of this letter, the current balance on your account is \$1,850.73. Because of interest that may vary from day to day, the balance due on the day you pay may be greater. This does not affect the above settlement offer.

Sincerely,

Northland Group, Inc.
866-380-8783

If you would like to pay your bill without talking to a representative, please log onto www.payments2northland.com.
Your access code is **1.15492440.508** You can also communicate with the Northland Group, Inc. through the payment website.

If you wish to talk to a representative please call Northland Group, Inc. at this toll-free number 866-380-8783.
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This communication is sent to you by Northland Group, Inc., a debt collector and a member of ACA International.
This collection agency is licensed by the Minnesota Department of Commerce.

1 of 3

Northland Account #: [REDACTED]
Client #: SP19
Original Account #: [REDACTED] 2442
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Or pay online at:
payments2northland.com

Payment Amount: \$215.92
Due Date: 11/01/07

Detach coupon and mail with payment

2 of 3

Northland Account #: [REDACTED]
Client #: SP19
Original Account #: [REDACTED] 2442
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Or pay online at:
payments2northland.com

Payment Amount: \$215.92
Due Date: 30 days from 1st payment

Detach coupon and mail with payment

3 of 3

Northland Account #: [REDACTED]
Client #: SP19
Original Account #: [REDACTED] 2442
Mail Payment to:
Northland Group, Inc.
P.O. Box 390846
Edina, MN 55439

Or pay online at:
payments2northland.com

Payment Amount: \$215.92
Due Date: 30 days from 2nd payment

Detach coupon and mail with payment

EXHIBIT K

DEPT 813 6315746908024
PO BOX 4111
CONCORD CA 94524-4111

P.O. Box 385908
Minneapolis, MN 55438-5908
1-888-411-4672

Return Service Requested

February 29, 2008



JOSEPH GARZA
10540 S GREEN BAY AVE
CHICAGO IL 60617-6237

CLIENT: RESURGENT CAPITAL SERVICES LP
CURRENT CREDITOR: LVNV FUNDING LLC
REGARDING: MONTGOMERY WARD
ACCOUNT NUMBER: [REDACTED] 2442
BALANCE: \$1945.83

LVNV FUNDING LLC HAS ACQUIRED YOUR ABOVE REFERENCED ACCOUNT. THE CURRENT SERVICER OF THE ACCOUNT, RESURGENT CAPITAL SERVICES LP, HAS PLACED IT WITH THIS AGENCY FOR COLLECTION.

THE BALANCE LISTED ABOVE IS THE AMOUNT OWED AS OF THE DATE OF THIS LETTER. THE BALANCE MAY CHANGE DUE TO INTEREST OR CHARGES ADDED TO THE BALANCE AFTER THE DATE OF THIS LETTER.

WE ARE AUTHORIZED TO OFFER YOU THE OPPORTUNITIES LISTED BELOW:

- () MY ACCOUNT WILL BE PAID IN FULL BY A ONE-TIME PAYMENT EQUIVALENT TO \$1945.83; OR
- () MY ACCOUNT WILL BE SETTLED IN FULL BY A ONE-TIME PAYMENT EQUIVALENT TO 35.00% OF THE ABOVE REFERENCED BALANCE IN THE AMOUNT OF \$681.04; OR
- () MY ACCOUNT WILL BE SETTLED IN FULL BY THREE EQUAL CONSECUTIVE MONTHLY PAYMENTS EQUIVALENT TO 50.00% OF THE ABOVE REFERENCED BALANCE FOR A TOTAL REPAYMENT OF \$972.91; OR
- () I WILL MAKE A MONTHLY PAYMENT THAT IS AFFORDABLE TO ME AT THIS TIME AS FOLLOWS, I WILL PAY \$_____ MONTHLY UNTIL MY ACCOUNT IS PAID IN FULL OR ANOTHER AGREEMENT IS NEGOTIATED. PAYMENTS WILL BE SENT ON OR BEFORE THE _____ OF EACH MONTH.

PLEASE MARK YOUR CHOICE WITH AN "X" IN THE SPACE PROVIDED AND FORWARD WITH YOUR PAYMENT TO THE ADDRESS LISTED BELOW. YOU MAY CONTACT THE REPRESENTATIVE LISTED BELOW WITH ANY QUESTIONS. THE OPPORTUNITIES LISTED ABOVE DO NOT ALTER OR AMEND YOUR VALIDATION RIGHTS DESCRIBED BELOW.

UNLESS YOU NOTIFY THIS OFFICE WITHIN 30 DAYS AFTER RECEIVING THIS NOTICE THAT YOU DISPUTE THE VALIDITY OF THIS DEBT OR ANY PORTION THEREOF, THIS OFFICE WILL ASSUME THIS DEBT IS VALID. IF YOU NOTIFY THIS OFFICE IN WRITING WITHIN 30 DAYS OF RECEIVING THIS NOTICE THAT YOU DISPUTE THE VALIDITY OF THIS DEBT OR ANY PORTION THEREOF, THIS OFFICE WILL OBTAIN VERIFICATION OF THE DEBT OR OBTAIN A COPY OF A JUDGMENT AND MAIL YOU A COPY OF SUCH JUDGMENT OR VERIFICATION. IF YOU REQUEST THIS OFFICE IN WRITING WITHIN 30 DAYS AFTER RECEIVING THIS NOTICE THIS OFFICE WILL PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM THE CURRENT CREDITOR.

SINCERELY,

SHAWN TAYLOR
ACCOUNT MANAGER
TOLL FREE: 1-888-411-4672

THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. THIS COMMUNICATION IS FROM A DEBT COLLECTOR. SEE REVERSE SIDE FOR IMPORTANT INFORMATION.

Office hours are: Monday - Thursday, 7am to 8pm; Friday 7am to 5pm; Saturday 7am to noon.

DETACH AND RETURN THIS PORTION OF THIS NOTICE WITH YOUR PAYMENT

NOTE: ANY CHECK RETURNED FOR INSUFFICIENT FUNDS OR ACCOUNT CLOSED WILL BE ASSESSED A \$15.00 CHARGE.

AMOUNT ENCLOSED: _____

FRS File#: [REDACTED]

HOME PHONE: _____

WORK PHONE: _____



PLEASE CHECK YOUR PAYMENT OPTION BELOW:

- () PAID IN FULL - \$1945.83
() SETTLED IN FULL - \$681.04
() SETTLED IN 3 EQUAL PAYMENTS TOTALING - \$972.91
() MONTHLY PAYMENT PLAN OF:
\$_____ BY _____ OF EACH MONTH
TOLL FREE: 1-888-411-4672

FINANCIAL RECOVERY SERVICES, INC.
P.O. BOX 385908
MINNEAPOLIS, MN 55438-5908



JOSEPH GARZA
10540 S GREEN BAY AVE
CHICAGO IL 60617-6237



We are required under certain State and Local Laws to notify consumers of those States or Localities of the following rights. This list does not contain a complete list of the rights consumers have under Federal, State, or Local Laws.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

The state Rosenthal Fair Debt Collection Practices Act and the federal Fair Debt Collection Practices Act require that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

ADDITIONAL INFORMATION FOR COLORADO RESIDENTS

FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE
WWW.AGO.STATE.CO.US/CADC/CADCMAN.CFM

ADDITIONAL INFORMATION FOR MASSACHUSETTS RESIDENTS

NOTICE OF IMPORTANT RIGHTS:

YOU HAVE THE RIGHT TO MAKE A WRITTEN OR ORAL REQUEST THAT TELEPHONE CALLS REGARDING YOUR DEBT NOT BE MADE TO YOU AT YOUR PLACE OF EMPLOYMENT. ANY SUCH ORAL REQUEST WILL BE VALID FOR ONLY TEN DAYS UNLESS YOU PROVIDE WRITTEN CONFIRMATION OF THE REQUEST POSTMARKED OR DELIVERED WITHIN SEVEN DAYS OF SUCH REQUEST. YOU MAY TERMINATE THIS REQUEST BY WRITING TO THE DEBT COLLECTOR.

IF YOU WISH TO DISCUSS THIS MATTER, PLEASE CALL US DIRECT, BETWEEN THE HOURS OF 8 A.M. AND 5 P.M. CST, AT THE NUMBER LISTED ON THE FRONT OF THIS NOTICE. MASSACHUSETTS RESIDENT OFFICE ADDRESS IS: 5230 WASHINGTON ST, WEST ROXBURY, MA 02132 WITH OFFICE HOURS: M-TH 10AM-3PM.

ADDITIONAL INFORMATION FOR MINNESOTA RESIDENTS

This collection agency is licensed by the Minnesota Department of Commerce.

ADDITIONAL INFORMATION FOR NEW YORK CITY RESIDENTS

This collection agency is licensed by the New York City Department of Consumer Affairs. The license number is 1015506.

ADDITIONAL INFORMATION FOR NORTH CAROLINA RESIDENTS

North Carolina Department of Insurance permit number: 3917.

ADDITIONAL INFORMATION FOR TENNESSEE RESIDENTS

This collection agency is licensed by the Collection Service Board of the State Department of Commerce and Insurance.

NOTICE FOR ALL CONSUMERS

Our staff is trained to conduct themselves in a businesslike and professional manner, and to leave you with a positive experience in dealing with our Company. Please call (866) 438-2860 with your criticisms, complaints, suggestions and compliments. To discuss the account, please call the number on the front of this letter. For your convenience, we do accept VISA and MASTERCARD payment and electronic checks over the telephone. There is also a \$15.00 charge assessed for checks returned to us for insufficient funds.

EXHIBIT L

DEPT 813 2228176008047
PO BOX 4115
CONCORD CA 94524

P.O. Box 385908
Minneapolis, MN 55438-5908
1-888-411-4672

Return Service Requested

April 15, 2008



JOSEPH GARZA
10540 S GREEN BAY AVE
CHICAGO IL 60617-6237

CLIENT: RESURGENT CAPITAL SERVICES LP
CURRENT CREDITOR: L VNV FUNDING LLC
REGARDING: MONTGOMERY WARD
ACCOUNT NUMBER: 2442
BALANCE: \$1950.80

TO MAKE THIS EASIER FOR YOU TO RESOLVE, WE ARE AUTHORIZED TO OFFER YOU THE OPPORTUNITIES LISTED BELOW:

- () MY ACCOUNT WILL BE PAID IN FULL BY A ONE-TIME PAYMENT EQUIVALENT TO \$1950.80; OR
- () MY ACCOUNT WILL BE SETTLED BY A ONE-TIME PAYMENT EQUIVALENT TO 35.00% OF THE ABOVE REFERENCED BALANCE IN THE AMOUNT OF \$682.78; OR
- () MY ACCOUNT WILL BE SETTLED BY THREE EQUAL CONSECUTIVE MONTHLY PAYMENTS EQUIVALENT TO 50.00% OF THE ABOVE REFERENCED BALANCE FOR A TOTAL REPAYMENT OF \$975.40; OR
- () I WILL MAKE A MONTHLY PAYMENT THAT IS AFFORDABLE TO ME AT THIS TIME AS FOLLOWS, I WILL PAY \$_____ MONTHLY UNTIL MY ACCOUNT IS PAID IN FULL OR ANOTHER AGREEMENT IS NEGOTIATED. PAYMENTS WILL BE SENT ON OR BEFORE THE _____ OF EACH MONTH.

PLEASE MARK YOUR CHOICE WITH AN "X" IN THE SPACE PROVIDED AND FORWARD WITH YOUR PAYMENT TO THE ADDRESS LISTED BELOW. YOU MAY CONTACT THE REPRESENTATIVE LISTED BELOW WITH ANY QUESTIONS.

SINCERELY,

SHAWN TAYLOR
ACCOUNT MANAGER
TOLL FREE: 1-888-411-4672

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DETACH AND RETURN THIS PORTION OF THIS NOTICE WITH YOUR PAYMENT

NOTE: ANY CHECK RETURNED FOR INSUFFICIENT FUNDS OR ACCOUNT CLOSED WILL BE ASSESSED A \$15.00 CHARGE.

AMOUNT ENCLOSED: _____

HOME PHONE: _____

WORK PHONE: _____

FRS File#: _____



PLEASE CHECK YOUR PAYMENT OPTION BELOW:

- () PAID IN FULL - \$1950.80
- () SETTLED IN FULL - \$682.78
- () SETTLED IN 3 EQUAL PAYMENTS TOTALING - \$975.40
- () MONTHLY PAYMENT PLAN OF:
\$_____ BY _____ OF EACH MONTH

TOLL FREE: 1-888-411-4672

FINANCIAL RECOVERY SERVICES, INC.
P.O. BOX 385908
MINNEAPOLIS, MN 55438-5908



JOSEPH GARZA
10540 S GREEN BAY AVE
CHICAGO IL 60617-6237



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